

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

United States of America

v.

Dale Ricardo Easterling

Case No.

1:18MJ600-RHW

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 13, 2018 in the county of Jackson in the  
Southern District of MS, Southern Division, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 846

Conspiracy to Possess with Intent to Distribute a Controlled Substance, to wit, 5 kilograms or more of cocaine, a schedule II controlled substance.

This criminal complaint is based on these facts:

See affidavit attached hereto and incorporated herein by reference.

☒ Continued on the attached sheet.

[Signature]  
 Complainant's signature

Jerome Lorrain, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

July 14, 2018

[Signature]  
 Judge's signature

City and state:

Gulfport, MS

Robert H. Walker, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT**

STATE OF MISSISSIPPI,  
COUNTY OF JACKSON

**A. Background and Experience of Officer**


Affiant, Jerome Lorrain, is an Agent with the Federal Bureau of Investigation (FBI) in Pascagoula, Mississippi. Affiant is the Coordinator of the FBI Safe Streets Task Force. Affiant has been employed with the FBI for 27 years. Affiant is empowered to enforce Title 21 and Title 18 and other criminal laws of the United States. Affiant has participated in and has conducted numerous investigations of individuals who have smuggled, received, and distributed controlled substances. Affiant has been involved in various types of surveillance, in the execution of search and arrest warrants, and in the debriefing of defendants, witnesses and informants, as well as others who have knowledge of the distribution and transportation of controlled substances.

**B. Facts and Circumstances**

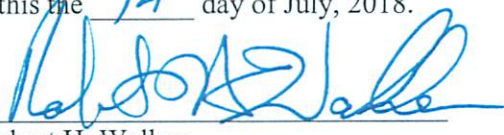
1. On July 13, 2018, your Affiant learned that Trooper Derek Cormier with the Louisiana State Police observed a Chevrolet Camaro, black in color, bearing a Mississippi license plate, traveling eastbound on Interstate 10 at mile post 17 in Calcasieu Parish, Louisiana. In this area of Interstate 10, there are three lanes of traffic. Trooper Cormier observed the Camaro moving from lane to lane and cutting between cars and passing them. The driver of the Camaro was not using his signals when changing lanes. Furthermore, the driver of the Camaro was changing lanes at an unsafe distance from the rear of multiple other vehicles.
2. Trooper Cormier turned on his blue lights and stopped the Camaro. The driver of the vehicle was identified as Dale Ricardo Easterling of Moss Point, Mississippi. Trooper Cormier noticed signs of deception and nervousness while talking to Easterling. Trooper Cormier also spoke to the passenger seated in the front, a female named Ziona Long, who was later found to be Easterling's girlfriend. Trooper Cormier also noticed Long showing signs of deception and nervousness.

3. Easterling offered to let Trooper Cormier search the Camaro. Trooper Cormier asked Easterling if anything illegal in the vehicle would belong to him. Easterling answered yes. Easterling signed a consent to search form for the Camaro.
4. Upon being given consent, Trooper Cormier searched the inside of the vehicle and noticed that the rear quarter panel had signs of tampering. On both the passenger's and driver's side rear fender areas, a section of the fenders looked to have been cut out and a small door installed. The door had hinges on it and was held shut with a large magnet. Inside the passenger side quarter panel, Trooper Cormier observed a black plastic bag, and inside the plastic bag, Trooper Cormier located two vacuum sealed bags containing a white substance. Based on Trooper Cormier's training and experience he believed the substance to be kilos of cocaine. Upon further search, Trooper Cormier located approximately seven kilos (or 16.48 pounds) of cocaine.
5. Easterling was advised of his Miranda rights, and upon waiving said rights, he told an agent with DEA that he was taking the cocaine to Moss Point, Mississippi for distribution. Easterling claimed ownership of the cocaine and advised that all of the cocaine was for himself. Easterling stated he planned to contact individuals to assist in selling the cocaine. Easterling stated that he would pay approximately \$26,500.00 to \$27,000.00 per kilogram to the source of supply. Easterling advised that the cocaine would sell for approximately \$32,000.00 to \$33,000.00 per kilogram in Mississippi. Easterling admitted that he normally purchased and received cocaine from a different Mexican source of supply and that the most he has received at one time from Texas was ten kilograms of cocaine. Easterling stated that his girlfriend had no knowledge of the cocaine.
6. On July 13, 2018, FBI's Safe Streets agents obtained a State of Mississippi Search Warrant for the residence of Easterling, in Moss Point, Mississippi. Agents recovered the following from Easterling's bedroom: one kilogram of cocaine, six pounds of marijuana, and \$10,000.00.

Based on the forgoing, your Affiant believes that probable cause exists showing that Dale Ricardo Easterling violated Title 21, United States Code, Section 846, in that Easterling did Conspire to Possess With Intent to Distribute a Controlled Substance.

  
Jerome Lorrain, Special Agent  
Federal Bureau of Investigation

SWORN TO AND SUBSCRIBED BEFORE ME, this the 14<sup>th</sup> day of July, 2018.

  
Robert H. Walker  
United States Magistrate Judge